

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
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<i>Counsel for the Plan Administrator</i>	
In re:	Chapter 11
BED BATH & BEYOND INC., <i>et al.</i> , ¹	Case No. 23-13359 (VFP)
Debtors.	(Jointly Administered)

**CERTIFICATION OF COUNSEL REGARDING PLAN ADMINISTRATOR'S
FIFTEENTH OMNIBUS OBJECTION (SUBSTANTIVE) TO CLAIMS
(Reclassify Bondholder Claims to Class 6 General Unsecured Claim)**

The undersigned hereby certifies that:

1. On March 13, 2025, the above-captioned debtors and debtors in possession (the “Debtors”) filed the *Plan Administrator’s Fifteenth Omnibus Objection (Substantive) to Claims*

¹ The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained at <https://restructuring.ra.kroll.com/bbby>. Pursuant to the *Certificate of Amendment of the Certificate of Incorporation of Bed Bath & Beyond Inc.*, which was filed with the State of New York Department of State on September 21, 2023, the name of the entity formerly known as “Bed Bath & Beyond Inc.” was changed to 20230930-DK-Butterfly, Inc. [Filing ID No. 230921001833 DOS ID 315602].

(*Reclassify Bondholder Claims to Class 6 General Unsecured Claim*) [Docket No. 3944] (the “Fifteenth Omnibus Objection”) (the “Omnibus Objection”)².

2. Pursuant to the *Notice of Objection to Your Claim* [Docket No. 3945] (the “Notice”) the deadline to object to the Omnibus Objection was April 15, 2025 (the “Objection Deadline”), and a hearing was scheduled for April 22, 2025 at 10:00 a.m. (ET) (the “Hearing”).

3. On April 16, 2025, counsel to the Plan Administrator filed a *Certificate of No Objection to the Omnibus Objection* [Docket No. 3985].

4. The docket entry related to the Fifteenth Omnibus Objection reads, “Minute of Hearing Held, OUTCOME: Revised, Order to be Submitted; to exclude Ms. Baum's claim. (related document:3944 Motion re: Plan Administrators Fifteenth Omnibus Objection (Substantive) to Claims (Reclassify Bondholder Claims to Class 6 General Unsecured Claims) Filed by Bradford J. Sandler on behalf of Plan Administrator. Hearing scheduled for 4/22/2025 at 10:00 AM, VFP - Courtroom 3B, Newark.. (Attachments: # 1 Exhibit A # 2 Exhibit B) Filed by Other Prof. Plan Administrator) (mcp)”

5. Ms. Baum’s claim was on the *Plan Administrators Sixteenth Omnibus Objection (Substantive) to Claims (Reclassified Gift Card/Merchandise Credit Claims No. 13* (the “Sixteenth Omnibus Objection”), and a revised order will be submitted to exclude her claim from that Order.

6. It is hereby respectfully requested that the proposed order originally attached to the Omnibus Objection and the CNO and resubmitted here as **Exhibit A** (the “Order”) be entered at the Court’s convenience.

² Capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Omnibus Objection.

Dated: May 16, 2025

/s/ Colin Robinson

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